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September 13, 2023

**VIA ECF**

Honorable Taryn A. Merkl  
United States Magistrate Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Bartlett v. Société Générale de Banque au Liban S.A.L.*, Case No. 19-cv-0007**

Dear Magistrate Judge Merkl:

We write to enclose as Exhibit 1 courtesy copies of the letter motion and proposed order Plaintiffs' counsel filed today in *Freeman, et al. v. HSBC Holdings plc, et al.*, No. 14-cv-6601 (PKC)(CLP), and *Freeman, et al. v. HSBC Holdings plc, et al.*, No. 18-cv-7359 (PKC)(CLP). Plaintiffs have requested that the Court in those cases permit discovery for the limited purpose of permitting them and the *Stephens* plaintiffs (in a related case) to constructively request records previously produced by non-party KBC Bank and *Freeman* Defendant Standard Chartered Bank that are already in the *Freeman* Plaintiffs' possession as a result of third-party discovery in the *Bartlett* case.

The letter motion notes that we are providing Your Honor with copies of the motion and proposed order and recognizes that Your Honor and Judge Chen have several alternative ways you may wish to proceed procedurally with respect to this issue.

Thank you for your attention to this matter.

Respectfully submitted,

/s/ Gary M. Osen

Encls.

cc: All counsel in *Bartlett* and *Freeman*